people and confirm that it's dial tone to the NID. But, a lot of times, the test, you just can't tell.

MR. WELCH: David or Gloria, do you have any thoughts on that?

MS. CALHOUN: With an unbundled loop alone, I think that you have some issues about how you define an unbundled loop and some of the testing capability that is available on that loop that is associated with an integrated exchange service might not be present when the loop is separated from the switch. So, I don't think it's possible to make a categorical statement, but to your question, if I may generally talk about Unbundled Network Elements, Bell South's TAFI system that I described will also handle trouble reports for any Unbundled Network Element that can be identified with a telephone number.

So, for example, an unbundled port can be reported through TAFI and appropriate status information can be obtained. A combination of a loop and port that can be identified with the telephone number will also be handled through TAFI, so it is possible for the Bell South system to provide an appropriate level of support for trouble reporting on Unbundled Network Elements, depending on how they're identified.

Anything that's not identified with a telephone number generally is associated or identified by a circuit

number, and those reports can be handled electronically through the electronic communications gateway or the electronic bonding arrangement that's available for design services.

MR. SWAN: I would agree with Bob and Rod both from their response. Bob initially commented at the time that the unbundled loop is placed in service, there's some coordination required and some testing in connection with that to assure that the service is in order.

When there is trouble, as Rod indicated, the initial testing should start with the CLEC, and to the extent that that testing suggests there's some difficulty from an ILEC standpoint, of course, we would become involved to support that.

MR. WELCH: Gloria, if I could ask you to address this, we've heard a lot about parity over the last two days and how the incumbent will provide the same type of access that they provided themselves to the new entrants. Could you please describe a little bit how your company will insure that there is non-discriminatory access to your repair personnel and assets between your retail unit and your new entrants? Are you recording or evaluating your performance for retail business with what you provide your new entrants, and is that information made available?

MS. CALHOUN: Well, there are two parts to your

question, and the system part of it is that the system is identical and the system is oblivious to whether a request for repair is originating with a CLEC or with a retail customer. So, in terms of appointment times or handling the -- it's really immaterial how, from whom the trouble report is originating.

But, in terms of, to get at the question of how you would measure that and how the trouble is actually handled, assuming that it requires a dispatch. Bell South has contractually agreed to contractual performance measurements.

MR. WELCH: David, would you like to say how Bell Atlantic is handling that, as well?

MR. SWAN: The process is basically parallel. There is, on a call from an end user, a check that we make initially to see if this in user, non-CLEC is the customer now of a reseller, for example, because some resellers have made it clear that should we receive that call directly, that we should refer it to the reseller.

So, in that instance, there is some distinction in the way we handle the initial receipt of the call. But, once the call is received or the trouble is reported, it's just a trouble with the system at that point, and we would manage it and process it the same way. As with Bell South, we have agreed on some going forward reports on a

comparative basis, to assure parity.

We produced reports on a quarterly basis that would summarize the number of trouble reports, the average time to clear and some measure of average or total network availability, for an individual CLEC, and then for all of the CLECs for whom we're providing service.

We also produced a summarization for the same metrics for Bell Atlantic retail customers in total, and then would include a similar analysis for our top three interexchange carriers, in this case AT&T, MCI and Sprint, again on a combined basis, to insure and to allow the CLEC to demonstrate that there's parity across that universe.

MR. WELBORN: Richard, I'd like to interject something. I believe that once the trouble reports get into the systems, the prioritization is in concert with the ILECs. However, there are different methods, depending upon the different type of service, of entering trouble reports, such as in Bell South's area, some of our unbundled elements are handled on a telephone call basis. They're referred on a manual basis and then entered into the system. All of that process is on a manual type basis.

So, you know, again, we need to take a look at what is mechanized, what is not mechanized, and realizing that there is a requirement to have everything mechanized so that it is handled the same all the way through the process.

MR. WELCH: Gloria, go ahead.

MS. CALHOUN: Again, I will say that Bell South is prepared to accept electronic trouble reports for any service or element that can be identified with either a telephone number or a circuit number.

MR. WELCH: As sort of a follow up to this, if I could ask Gloria and David to comment on it, do the new entrants have the ability to receive automatic notification of repair completion for both Unbundled Network Elements and for resold services, as well as the ability to track the status of those repairs as they're going on? Is that something that your systems offer?

MS. CALHOUN: Yes, for Bell South.

MR. SWAN: And, yes, for Bell Atlantic. It's a little different depending on the electronic interface employed. With electronic bonding OSI, it's the statusing and the clearance is automatic, but with ECG, a gateway process, there is some requirement that the CLEC query the system to confirm the status update and the clearance time. However, for the clearance of the report, at any time it wants what is cleared through the gateway, they could introduce a direct status that would inform them that the trouble had been cleared. But, the actual information related or describing what caused the problem and how it was cleared, they'd have to access on a query basis.

MR. WELCH: Bob and Rod, if I could ask each of you, is this something that you need and what has been your experience with this so far?

MR. WELBORN: Richard, I'll take a stab at that. Yes, it is something that we need. It's something right now today in many cases there's no positive notification made when a trouble is clear. It's only whether or not you take the time to search through the system itself and gathered those statuses on your own.

There is no proactiveness, and that differs from ILEC to ILEC. Some of them do notify you, such as they have the technician call your, the CLECs repair center, clear it out with the repair center. There are others that refuse to do that, and that it's totally on a passive basis. If you want to go in and see if the trouble was cleared, you can do so.

MR. COX: I guess from our point of view now, we're pretty much a manual process with Ameritech, primarily calling back and forth and we have driven the issue pretty hard, especially out of service trouble, clear within 24 hours and those kind of things. We get a pretty good response back from them.

The GUI that we're getting ready to test will provide that information. We'll be able to go in and see. The problem is, you have to have somebody going in there and

scrolling for that information. We want some kind of flag back if we're going to use the GUI that says, you've got something in jeopardy here or it's getting close to the time when it should have been put into place or whatever or fixed.

So, that is the problem with the GUI. An online system, you should have some kind of flag that would already come up and give you a red signal or something that's going on there.

MR. WELCH: Okay, I think Kalpak has a question.

MR. GUDE: This is directed towards both David and Gloria. If a service outage occurs for a CLECs end user, do you require CLEC authorization before a dispatch is made?

MS. CALHOUN: I'm not sure I completely understand your question.

MR. COX: I think what you're trying to get at, if there is an outage that you're aware of, is there authorization required by the CLEC before you will dispatch service people to address that problem?

MR. GUDE: No, no, I'm talking for particular end users.

MS. CALHOUN: So, you're saying, for example, if the CLEC end user were to call us directly, would we dispatch without contact of a CLEC?

MR. GUDE: I'm saying, well, either in that case

or the case that you become aware of it independently and you haven't been notified at that point?

MS. CALHOUN: In the case of a CLECs end user calling us directly, we would ask the end user to contact their local service provider and any interaction we have with be with the CLEC, presumably through our electronic interfaces.

If, I don't know the answer to your question, but if we became aware of a problem with a particular customer before a CLEC, my initial reaction is that we would probably work with a CLEC and not interact directly with their end user.

MR. SWAN: In Bell Atlantic's case, I did much as Bell South's. If the CLEC user calls us direct and this is at the, again, the direction of the CLEC, we would refer the call to the CLEC. If the trouble, once provided to us, either verbally or through one of the electronic interfaces by the CLEC, results in a circumstance where a dispatch is necessary with the CLECs' concurrence, we would dispatch, and that concurrence could be given on a blanket basis for all of the troubles that would result in a dispatch on an individual basis, depending on the relationship that we've negotiated with the CLEC.

MR. GUDE: Also, the other question is, have you trained or done other work with your repair personnel, to

prepare them for their new roles as wholesale repairers? Is there sort of a different role for them? I think that's sort of a fundamental question for that?

MS. CALHOUN: Well, I'm going to have to separate that question into the different types of folks who would be involved in repair. First of all, our Bell South repair attendants would not be, in most cases, dealing directly with a CLEC end user, because of what we just talked about. So, the folks who would actually become involved would be anybody who might need to be dispatched out and those people have been trained on their responsibilities, their obligation to provide non-discriminatory service, their obligation not to interfere in anyway with the CLECs business relationship with their customer.

MR. SWAN: In Bell Atlantic's case, again, much as with Bell South, the -- if there is a need to dispatch, of course there would be a Bell Atlantic repair person at the sight of the CLEC end user. Of course, we spent some time with our repair folks to prepare them for that circumstance. We have also worked with the group of CLECs who are our customers, on leave behind material or collateral that may be necessary to show, confirm that we're there on behalf of, and although we're a Bell Atlantic employee, we're there on behalf of CLEC A, CLEC B.

Of course, there's been some orientation and

training of the repair folks for that eventuality. For the repair attendants, because of the need, as to receive a call from the end user, to recognize that not all of the calls that will come into the center in the wholesale arrangement will be from the Bell Atlantic end user, may, in fact, be from the CLEC end user. There has been some training and orientation required, even for the inside attendant.

We had considered the velcro patch for the badge and for the trucks, but we went beyond that.

MR. WELCH: Okay, i think now we have an opportunity if there's anybody in the audience who'd like to pose some questions to the panelist. Please identify yourself and direct your question to a particular panelist, if you would, please?

MS. DALTON: Good afternoon, Nancy Dalton with AT&T. My question is for Mr. Swan. Mr. Swan, in your opening remarks, you reference the LMO system that's used in Bell Atlantic today for repair and maintenance capabilities for POTS services and WFA is used for your design services.

If a CLEC is to create a POT service, purchasing an unbundled loop and switch port from Bell Atlantic, which of those systems will be used to provide the OSS capabilities for repair and maintenance?

MR. SWAN: I may have to take -- I don't know the exact answer to that. I believe that the way that we've

established with in our systems the components for the unbundled or platform service, that they would exist within the LMO system.

MS. DALTON: I believe that was the case for Bell South, as well, with the TAFI capabilities, is that right?

MS. CALHOUN: Yes, our TAFI system is being taught, if you will, to recognize that a recombination of unbundled elements that replicates a retail exchange service is, for all intents and purposes, a retail exchange service, or, excuse me, a resold exchange service for repair purposes.

So, yes, it would appear as an exchange service and would be handled in LMOs.

MS. DALTON: So, then, parities being treated from, looking at the view of like services being treated equally, POT services being treated equally amongst carriers?

MS. CALHOUN: Yes.

MS. DALTON: Okay, thank you.

MR. SWAN: No, no, if I understand the direction of the question, the unbundled element is not directly comparable in terms of how it's put in place, how it's implemented, how it's provisioned and how it's maintained from a facilities standpoint directly to an exchange line, if you will.

It's a series of unbundled elements which provide the same functionality and service as a local exchange line, but they're unbundled elements and that's the way that their provision and the way we maintain the facilities and the records.

MS. CALHOUN: I would agree with that for Bell South. I would agree with that from the perspective of individual, unbundled elements, but for a recombination of unbundled elements, our TAFI system would translate that as an exchange line.

MS. DALTON: I just want to make sure that I understand. If I am buying a series of elements and I'm buying them all from either of your companies and I'm purchasing them to create a POTS service, will I have the same capabilities for repair and maintenance as you each have with respect to servicing your POTS services? If I understood correctly, I'll have those capabilities through TAFI for POT services, just as Bell South provides to itself.

I'm not sure, based upon the last clarification, if a CLEC would have those same POTS capabilities through LMOs, regardless of whether it's created the service through unbundled network elements or not?

MR. SWAN: The distinction I was trying to make, and I apologize if I made it awkwardly, is that we view the

platform again as a series of distinct, unbundled elements, which, though ordered separately, provisioned separately, provide in terms of service functionality, the same as basic local exchange service.

Now, because they're ordered separately as separate Unbundled Network Elements, we provision them and maintain records and facilities on them as separate elements. They would occur within LMOs as those separate elements.

The way that we would seek to complete trouble analysis and reporting may be more akin, if I could use that term, to the way we manage unbundled loops as opposed to regular POTS service. We're still working out those specific details.

MS. DALTON: Thank you.

MS. STROMBOTNY: I'm Tracy Strombotny with LCI. It sounds like from listening to people here that we're not alone in suffering disconnects during the provisioning process, and I'd like to know how Bell Atlantic and Bell South, how your trouble systems handle those disconnects, because in many cases, as the provisioning process is not complete, we're not the customer of record. And, so, we have a hard time getting those problems resolved, and yet our customer is out of service.

So, I'd like to know how your systems handle that?

MS. CALHOUN: First of all, let me make sure I understand your question. Are you talking about a customer whose exchange service is being changed to something that would involve an unbundled loop, or are you talking about a migration of a --

MS. STROMBOTNY: In assume as is resale situation.

MS. CALHOUN: In assume as is resale situation? The way Bell South is provisioning an assume as is resale, the disconnect should not occur.

MS. STROMBOTNY: I understand it shouldn't, but it does, so that's why I'm asking. We've encountered this problem with every ILEC that we've dealt with, Bell South included.

MS. CALHOUN: Again, if it's a situation where you're assuming it as is and there's no work required, the way our processes are set up, that should not be happening. Now, if you have some other ordering scenario that's occurring that's causing that, I don't know.

From a repair perspective, there is a time period following issuance of a service order, where it's a provisioning question versus a maintenance question. But, in general, there is a single point of contact set up. We have an access customer advocacy center is what it has historically been called, and there is a center assigned to support CLECs, and that would be a point of resolution,

single point of resolution for troubles associated with either provisioning or repair.

MS. STROMBOTNY: Is this the same, then, as would be experienced by a Bell South end customer? Is that the same group or the same service that would be provided when you were trying to assume a customer or get a customer turned up?

MS. CALHOUN: In terms of whether it's considered provisioning or maintenance?

MS. STROMBOTNY: Mm-hmm.

MS. CALHOUN: Yes.

MR. SWAN: From a Bell Atlantic standpoint on the question with the as is migration, again, no work required, no physical work required and no switchwork required, it's record exchange, and there would be no need for the service to be interrupted.

In the resale migrations that we've completed to date, I'm not aware of any difficulty where we have inadvertently disconnected or disrupted any user service.

MR. BRADBURY: Hi, Jay Bradbury with AT&T. Hi, Gloria. You and I have been talking about this subject since August of 1995. TAFI and EDI as they are today kind of bring each half a loaf to the table. You know, AT&T has a strong desire, just like Mr. Welborn discussed there for system integration.

The EDI interfaces existent in Bell South today has the mapping there for the access circuits that are used, but if you send a local over on it, it doesn't automatically give you back anything, because it's not mapped.

TAFI, on the other hand, is a human to machine interface. We talked some time ago and I've been talking with many people in Bell South about marrying those two up together, putting TAFI, if you would, behind the EDI interface, to get the advantage of the standards and all of the system's expertise that exists in TAFI.

Has anything happened since last April on that?

MS. CALHOUN: Bell South has provided non-discriminatory access to its TAFI system by making information and functions available to CLECs in substantially the same time and manner we have available for our retail customers. And, we've made that functionality available to AT&T in exactly the same way we have it available for ourselves.

The trouble reporting gateway or the electronic bonding gateway has been available for use by our exchange carriers, such as AT&T, for the last couple of years, and when Bell South implemented that gateway, we agreed there were standards for an interface to what we call WFA, what Bell Atlantic calls WFA for design services and there were standards available for an interface to LMOs. And, our

implementation agreement at that time was that we would only implement the WFA aspects of that, and we have agreed with AT&T that by December of 1997, we will go and build out the LMOs side of that electronic bonding interface, but we will do it in such a way that it meets the existing standards for the LMOs functionality in that interface.

TAFI is something that, frankly, is far above and beyond what the current industry standards for trouble reporting in the access world provide for, and at this point, we have said that we have made full TAFI functionality available. We have agreed to build out the full functionality through the electronic bonding gateway that currently is supported by industry standards, and what we've not agreed to do is to replicate all of the TAFI functionality in the electronic bonding arrangement, because that would render it a non-standard interface.

So, what we've done is agree to provide a totally standard interface, and to provide all of the functionality for TAFI as currently available that's sitting today, ready and waiting to be used.

MR. SWAN: I can say without hesitation, that nothing has happened in Bell Atlantic on that issue.

MR. WELCH: Any other questions from the audience?

MR. CLUBFELD: Hank Clubfeld from SAIC. Gloria mentioned a security check, which I think is an excellent

approach. I was wondering if the panel had a chance to read on the FCC's Web page, on the Office of Engineering Technology on Damrick the planning for operations support interfaces that looks at the functionality of a gateway, the need to address security, given the fact that these are sensitive operation systems that need petition to make certain that the CLEC is the right CLEC for that party, and that the bad guys don't get in looking like the CLEC.

Would you care to comment on that, particularly with respect to the discussion for the particular OSSs that each of you are trying to get addressed?

MS. CALHOUN: Well, I can say that Bell South has participated in the development of the document that you're talking about and that we have stayed abreast of it and consider it in our planning and development efforts.

MR. SWAN: As has Bell Atlantic. In preparation for the panel periods, we spent some time in conversation with the Bell Atlantic representative from Bell Corp. on that effort.

And, security has been a primary focus at each point in our electronic interfaces to OSS functions, both through the gateway and through -- although not to the, with the same approach, even with our electronic bonding initiative.

We do that from a far wall standpoint, and then

actually when we get to the target operating support system database, for further security checks at the individual data customer level.

MR. WELCH: Well, I think that concludes this panel. I want to thank our panelists, Rod Cox, Bob Welborn, David Swan and Gloria Calhoun, for being with us.

I'd like to thank all the panelists over the last two days who went out of their way to come and join us and offer their views. It helped the FCC understand the issues. I hoped it helped the people in the industry understand the issues, and I will spare you any more baseball metaphors and just say, we're done. Thank you.

(Whereupon, at 1:00 p.m., the hearing was concluded.)

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